

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THAI-LAO LIGNITE (THAILAND) CO., LTD. &
HONGSA LIGNITE (LAO PRD) CO., LTD,

Petitioners,

v.

GOVERNMENT OF THE LAO PEOPLE'S
DEMOCRATIC REPUBLIC,

Respondent

Index No. 10 Civ. 5256 (RW) (KMW)

Stipulation

WHEREAS, Petitioners commenced this proceeding in the Supreme Court of the State of New York (New York County) (the "State Court") on June 8, 2010 by serving the following papers (collectively, the "Papers") on Respondents: Notice of Petition, Petition, Declaration of Wirach Nimmanwathana, Memorandum of Law in Support of Petition to Confirm Arbitral Award, Request for Judicial Intervention, and Motion for Admission Pro Hac Vice of Christopher F. Dugan; and

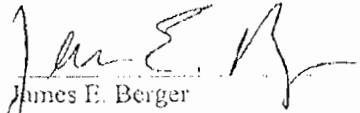
WHEREAS, Respondents, through their undersigned counsel, removed this proceeding from the State Court to this Court by serving a Notice of Removal on July 9, 2010; and

WHEREAS, the parties have conferred concerning scheduling and other matters; it is hereby AGREED and STIPULATED that:

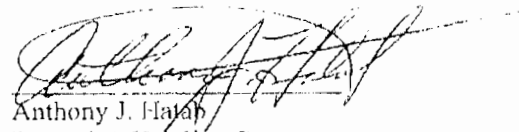
1. Respondent shall have until **October 3, 2010** to serve and file any papers opposing the Petition herein.
2. Respondent hereby waives any objections or defenses based upon Petitioners' service of the Papers, including, without limitation, any defenses based on 28 U.S.C.

§ 1608 and/or Rule 12(b)(4) or 12(b)(5) of the Federal Rules of Civil Procedure.

AGREED:

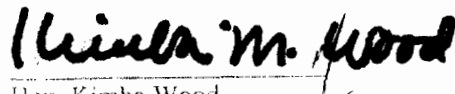

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Attorney for Respondent
Government of the Lao People's
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SO ORDERED: 7/23/10


Hon. Kimba Wood
United States District Judge